

UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

JOHNNY M. HUNT,)	
)	
<i>Plaintiff,</i>)	
)	No. 3:23-cv-00243
v.)	
)	JUDGE CAMPBELL
SOUTHERN BAPTIST CONVENTION;)	MAGISTRATE JUDGE FRENSELY
GUIDEPOST SOLUTIONS LLC; and)	
EXECUTIVE COMMITTEE OF THE)	JURY DEMAND
SOUTHERN BAPTIST CONVENTION,)	
)	
<i>Defendants.</i>)	

**SECOND AMENDED 30(b)(6) NOTICE OF DEPOSITION OF THE EXECUTIVE
COMMITTEE OF THE SOUTHERN BAPTIST CONVENTION**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiff will take the deposition of a representative by oral examination of the **EXECUTIVE COMMITTEE OF THE SOUTHERN BAPTIST CONVENTION** (“Executive Committee”) at **Bradley Arant Boult Cummings LLP, 1221 Broadway, Suite 2400, Nashville, Tennessee 37203** on **February 27, 2024**. The deposition will commence at 9:00am Central Time and will continue day-to-day until completed.

The deposition will be transcribed by a court reporter, may be videotaped, and will continue day-to-day until completed. Counsel are invited to attend and cross-examine. The Executive Committee shall designate one or more officers, directors, managing agents, executive officers, or other persons duly authorized and consenting to testify on its behalf on the topics below. No later than three (3) business days prior to the deposition, the Executive Committee shall identify the person(s) who will testify on its behalf pursuant to this notice and the matter(s) about which each person will testify.

Definitions

1. “Executive Committee,” “you,” and “your” refers to Defendant Executive Committee of the Southern Baptist Convention and its respective successors or predecessors in interest, affiliates, members, directors, officers, agents, employees, and/or independent contractors, consultants, and all persons (including, without limitation, its attorneys, accountants, and advisors) acting or purporting to act on its behalf.
2. “Johnny Hunt” refers to Plaintiff Johnny M. Hunt.
3. “Complaint” refers to the Complaint in this matter and any subsequent amendments.
4. “Report” refers to the “Report of the Independent Investigation, The Southern Baptist Convention Executive Committee’s Response to Sexual Abuse Allegations and an Audit of the Procedures and Actions of the Credentials Committee” and any versions or drafts of the same.
5. “Complainant” refers to the woman mentioned in the Report who made allegations against Plaintiff.
6. “Guidepost” means to Guidepost Solutions LLC and its respective successors or predecessors in interest, parents, subsidiaries, divisions, affiliates, directors, officers, agents, employees, and/or independent contractors, consultants, and all persons (including, without limitation, its attorneys, accountants, and advisors) acting or purporting to act on its behalf.
7. “SBC” means Defendant Southern Baptist Convention and its respective successors or predecessors in interest, affiliates, members, directors, officers, agents, employees, and/or independent contractors, consultants, and all persons (including, without limitation, its attorneys, accountants, and advisors) acting or purporting to act on its behalf.

8. “Task Force” means the SBC Task Force as defined in the Complaint and its respective successors or predecessors in interest, affiliates, members, directors, officers, agents, employees, and/or independent contractors, consultants, and all persons (including, without limitation, its attorneys, accountants, and advisors) acting or purporting to act on its behalf.

9. “Cooperation Committee” means the Committee on Cooperation of the Executive Committee as defined in the Complaint and its respective successors or predecessors in interest, affiliates, members, directors, officers, agents, employees, and/or independent contractors, consultants, and all persons (including, without limitation, its attorneys, accountants, and advisors) acting or purporting to act on its behalf.

Topics

1. The Executive Committee's organizational structure, including by-laws, and the establishment of the Committee on Cooperation.
2. The engagement and retention of Guidepost for the Report, including the events that led to the need for an investigation, the scope of work under the engagement letter, and approval process for the Report.
3. The total amount of time billed by Guidepost for work on the Report and the total amount of money that Guidepost was paid for that work.
4. The definition for sexual abuse adopted during the 2022 meeting of the Southern Baptist Convention: "Sexual abuse is defined as any sexual act that could result in criminal charges or civil liability in the jurisdiction where it occurred." *See* https://www.sataskforce.net/updates/task-force-challenges-and-formal-recommendations-sn54p#_ftn1
5. The Southern Baptist Convention Credentials Committee letter to Hiland Park Baptist Church and any similar communications to other churches. (Doc. 1-4).
6. The respective roles played by the Executive Committee, the SBC, the Task Force, and the Cooperation Committee in the review, drafting, and editing of the Report prior to its publication, including the identities of the individuals for each of these entities who were involved.
7. Publication of the Report.
8. All edits, comments, feedback, and/or suggestions provided by any member of the Executive Committee, the SBC, the Task Force, and the Cooperation Committee to Guidepost on any version of the Report and Guidepost's response to same.
9. All deliberations and communications regarding the decision to include the allegations against Plaintiff in the Report.
10. Any material that anyone requested be removed from any version or portion of the Report, including Guidepost's response to the request.
11. All materials relating to the allegations against Plaintiff in the Report that were made available to the Executive Committee, SBC, Task Force and Cooperation Committee prior to the Report's publication.
12. The Executive Committee meeting on May 19, 2022 regarding the Report. (EC-000311).

13. The Executive Committee meeting on May 24, 2022 regarding the Report. (EC-000311).
14. Any communications with Guidepost relating to the allegations against Plaintiff or the decision to include Plaintiff's name in the Report. This includes communications after publication of the Report.
15. Any communications between members of the Executive Committee relating to the allegations against Plaintiff or the decision to include Plaintiff's name in the Report. This includes communications after publication of the Report.
16. Any communications with the SBC relating to the allegations against Plaintiff or the decision to include Plaintiff's name in the Report. This includes communications after publication of the Report.
17. Any communications with third parties relating to the allegations against Plaintiff or the decision to include Plaintiff's name in the Report. This includes communications after publication of the Report.
18. The publication of the Report to any third party, including dissemination by email, hyperlink, or other electronic means.
19. Any communications with Complainant and Complaint's husband.
20. All communications after the Report's publication with churches, seminaries, schools, and publishers relating to Plaintiff or the Complainant's allegations against Plaintiff.
21. Bart Barber's Tweet attached to the Complaint. (Doc. 1-3).
22. Bart Barber's public posts regarding Plaintiff.
23. Executive Committee members' public posts regarding Plaintiff.
24. Baptist Press articles regarding the Report and the allegations against Plaintiff.
25. The role of the liaison between Guidepost and the Executive Committee regarding Plaintiff.
26. Any communications with the liaison concerning Plaintiff.
27. The demand letter sent to the Executive Committee from Plaintiff's counsel. (Doc. 1-5).
28. The Executive Committee's discovery responses.

29. The Ministry Check initiative, including the standards for credibly accused and the engagement of Guidepost for the initiative.

Dated: February 19, 2024

/s/ Robert D. MacGill

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served on February 19, 2024, on the following counsel via email only:

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